

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE AT NASHVILLE

Chris Sevier Plaintiff V. Apple Inc and Hewlett Packard		CASE NO: 3:13-cv-00607 Honorable Judge Campbell
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**MOTION TO DISQUALIFY AND INJOIN THE LAW FIRM OF LIGHTFOOT
FRANKLIN & WHITE FROM PARTICIPATING IN THIS ACTION FOR PRACTICING
LAW WITHOUT A LICENSE AND FOR VIOLATING RULES 1.7 AND 3.7**

Now Comes I, Chris Sevier, pursuant to LR 83.01 and rule 1.7, and 3.7 of the Tennessee Board of Professional Responsibility requesting that this Honorable Tennessee Court bar Sara Ford Esq. and any member of the law-firm Lightfoot, Franklin, & White from having any involvement in this critical lawsuit that has the capacity to inflict a huge blow to the demand side of sex trafficking, child pornography, and sexually destructive behavior that stems from viewing smut on the defendants unregulated devices. I ask this Court to be mindful of every single child molestation and sex crime case that has come before it and to consider whether the suspect would have committed the crime, if this filtering system was in place. My demand in the proposed rule 68 offer of settlement comports with the totality spirit of our laws taken in the aggregate. This is serious business that could impact the world. We do not need some nonresidential hot shot lawyer prizing greed over unequivocal morality. Given the low burden placed on Apple and HP by my demand and the tremendous harm they are causing, at no time do

they deserve breaks.

I love the American system because it is based on checks and balances. When the Congress cannot get their act together on a certain matter, us citizens can turn to the Courts to make things that are inherently wrong right. Here that scenario can play out perfectly. The Federal Trade Commission and FTC cannot seem to get its act together to legislate blanket law to make all device makers comply with the law that prohibits the selling of smut to minors, so I am turning to the Court's to fix what the legislature has not. British Prime Minister is doing a much better job than any of us are in leading the charge to be responsive to a glaring problem that involves the welfare of children, families, and society as a whole.

In terms of disqualification, first, Sara Ford is not even licensed to practice law in the state of Tennessee. Besides violating LR 83.01(d)(1) and (3), she is literally committing the crime of practicing law without a license in our state by representing Apple and HP. In theory, she could be arrested for her criminal actions, but ADA who are sympathetic to my plight to put a dent in sex trafficking. Second, Mrs. Ford, out of the gate committed an blatant ethical violation today, when she offered to present my rule 68 offer of settlement to her clients contingent on my agreeing that I give her extended time to file an answer to the complaint because she is grossly incapable of inventing an excuse that will justify her client's injurious failures. Mrs. Ford cannot negotiate compliance to the ethical rules as consideration as an excuse for failure to prepare, when she has a mandatory obligation to strictly comply with the rules of professional responsibility always. (Apple has been in possession of this action since June 2013; Apple's pro-sex trafficking and child prostitution executives have even gone so far as to mouthed

off about my lawsuit to the media, suggesting that the case was merely a shake down for money - because they expect everyone to be as motivated by money as they are.) Instead of pathetic finger pointing and engaging in pathetic misdirections, why is it so difficult for Apple and HP to see to admit wrong and fix the problem. Apple and HP should be able to see that this lawsuit was crafted for the paramount purpose of protecting families and children from being permanently destroyed as a result of their dangerous products. I am giving Apple and HP the opportunity at this Christmas time to take the lead and set the example. Currently, Apple and HP are both blatantly violating the laws which prohibit a retailer from selling smut to minors by failing to act, while falsely holding themselves out as "family friendly" companies. This is the worst kind of hypocrisy that warrants the most severe scrutiny).

Third, there are over 1,300 law firms in North America alone. Apple and HP should have the common sense to retain a law firm that has not attempted to hire their party opponent. This occurred not only once but twice. This consideration causes Mrs. Ford's involvement here to fail to pass the smell test. The first time Lightfoot Franklin asked me to interview for a job at their firm was when I was a 1L at Vanderbilt law school. I passed on their firm so that I could run Severe Records LLC on music row. After all, I did not want to sell my soul to money in inventing unjustifiable legal defenses for pro-sextrafficking companies like Apple and HP. The second time I interviewed for a possible position at their firm, I was training as an Army Judge Advocate at UVA law school, TJAGLCS in Charlottesville Virginia. I passed on working at their small litigation firm a second time in order to fulfill my duty to go overseas to serve our Country during a time of war. Because the tangible distinction between me and the lawyers at Lightfoot Franklin is that I do not just give lip service that I am going to help the greater good, I take actual

action - prioritizing service over money.

I have direct privity to all kinds of inside knowledge about this particular Alabama law firm that would be prejudicial to the interest of justice and creates an insurmountable conflict of interest under rule 1.7. However, I only have extremely positive things to say, which means that I would expect Lightfoot Franklin to have the character to find Apple and HP's refusal to offer my proposed rule 68 offer of settlement to be insurmountably repugnant. Furthermore, there is a glaring conflict of interest insofar as my father, who works at much larger and reputable law firm across the street from Lightfoot, refers business to that small litigation boutique all the time. Lightfoot junior was hired by my dad after all. In theory, those referrals would cease and desist entirely, if the boutique thinks that appearing to oppose me in matters that protect families, law enforcement, husbands, women, and children is an economically rational decision. If Lightfoot Franklin defends my opponents, then they obviously prize money over morality. But if that is true, they cannot represent Apple and HP because of the amount of money they would lose in referrals. This is why rule 1.7 was invented. There are thousands of other firms out there who are not subject to these same leveraging considerations and as an officer of the court it is my duty to point out these considerations.

I admit that I do not know Professor Sara Ford personally, but I would hope that the values that Lightfoot and Franklin were founded on would immediately compel it find their client's refusal to comply with my demand to be outrageously repugnant to the extent that they would sua sponte refuse to advocate Apple and HP's unjustifiable position. Birmingham law firms are founded on principle and integrity, not greed. I can attest having interviewed there twice that for

Lightfoot Franklin to involve themselves in this action other than to facilitate a settlement conference would offend the principles that their firm was founded on in the same way that Apple and HP hold themselves out as being pro-family, while failing to sell to make their products safe. This lawsuit is no game, it has real world implications for millions of people to include law enforcement agents and sons who might spend their lives in jail, who otherwise would not have because they were influenced by unfiltered pornography material that they accessed on their HP and Apple device. Let us never fail to mention the number of victims that could be spared from traumatization as a result of the implementation of my low burden proposal.

Fourth, law firms in Birmingham practice under an entirely different culture than the ones in Nashville. Apple and HP would be wise to hire a firm that has no moral compass, like some of the ones in Nashville, who will justify representing Apple and HP under the same immoral mentality that compels the executives at Backpages.com to defend that blatant prostitution hub - money. Mr. Lightfoot's son was my football mentor, when I was playing auditioning for quarterback at Mountain Brook High School. I very much like the Lightfoots and know them well, but what I do not like is what Apple and HP are doing to our world by requiring the burden be on those who do want to see pornography to have the burden to take the steps to block it, when the burden should unquestionable be on those who want to see damaging obscenity to take the steps to garner access. My personal love of the Lightfoots is not outweighed by my utter disgust at the impact that unregulated internet pornography is having on our Nation and our world, which is primarily being accessed by HP and Apple devices. As we say in the military, "we do not sacrifice the whole for the one." While Jay Leno, Bill O'Reilly, and David Letterman,

might think this is funny. I am not laughing and neither should this court. I have resolved to do all I can to make Apple and HP be responsive. Even if I have to be the Rosa Parks in this matter. I do not want to see Lightfoot Franklin have to hire a publicist as the end result of their decision to defend Apple and HP, when they are to blame for so much damage.

In terms of other conflicts, many of the members of Lightfoot Franklin belong to the same organization that I do, Church Of The Highlands. I have observed some of the members in attendance. Upon information and belief, Sara Anne Ford is a member of that church. She has had access to documents, information, and witnesses who I will call to testify in this action. One of those witnesses can be found here: <http://www.churchofthehighlands.com/media/message/bad-eyes> (fast forward to 16 minutes to 21:50). The members of her law firms pre-existing awareness and access to this kind of material evidence is prejudicial to the interest of justice. As parents and members of a community with a such a strong moral code that makes the Nashville bar more or less resemble the mansion family in comparison, the Lightfoot Franklin should likely be have moral objections to advancing Apple and HP's position.

Additionally, there appears to be other conflict of interests. There are anti-sex trafficking advocacy groups that are based in Birmingham that Lightfoot Franklin has likely done pro-bono work for. These organizations include Well House and Well Spring Christian Clinic, just to name two. These groups deal with the aftercare portion of sex trafficking, as well as treating sex addicts, who became that way after using Apple and HP products. These organizations will be called as expert witnesses to attest to the horrible impact that internet pornography is having on our society, and the reasons why Apple and HP should be held primarily accountable. Because

of Lightfoot Franklin's apparent connection and support of these groups based in Birmingham, there is a material conflict of interest that should force them to bow out. Apple and HP should be required to find a law firm that is solely founded on the principle of making money, here at this Christmas time. It is my expectation, demand, and call on Lightfoot Franklin to completely take my side on this matter, and accordingly, I expect their firm to stand with me, not against me. All of us need to face the fact that there is more to life than money. This action is a matter of the heart, and if the United Kingdom can convince Apple and HP to adopt this policy overseas, Apple and HP should follow suit here. As adults, we need to seriously magnify the consequences of this action, given what I am proposing. We have the opportunity to collectively take a huge step in pushing our world back in the direction of innocence. The evidence shows that Lightfoot Franklin would stand with me on that.

s/Chris Sevier/
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CERTIFICATE OF SERVICE

These documents were mailed to Apple and Hewlett Packard to their principle places of business with adequate postage on 12/18/13.

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